

Volume I  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

No. 1:17-cv-10107-WGY

DAVID SETH WORMAN, et al.,  
Plaintiffs,  
vs.  
CHARLES D. BAKER, et al.,  
Defendants.

DEPOSITION OF ALAN ZANI  
Friday, September 15, 2017 at 12:10 p.m.  
Campbell, Campbell, Edwards & Conroy  
One Constitution Center  
Boston, Massachusetts 02129

-----Jennifer A. Doherty, CSR-----  
Certified Shorthand Reporter

C. J. REPORTING  
P.O. Box 1373  
Andover, MA 01810  
617.763.1725  
www.cjreporting.com

1 of Page 13, the Colonel states: "Beginning in late  
2 2015, Massachusetts State Police Lieutenant Alan  
3 Zani participated in reviews of firearms sales." Is  
4 that accurate?

5 A. Let me read this one more time. I  
6 participated in firearms reviews sales? To a  
7 limited extent that's partially accurate.

8 Q. What was the extent of your review of  
9 firearms sales?

10 A. There would be occasion that I would hear  
11 of an FFL or a federal firearms licensed dealer  
12 selling firearms that weren't on the approved roster  
13 and/or glocks being sold to non-law enforcement  
14 personnel. From that I would be provided with a  
15 sampling of their monthly sales report and could  
16 either discern from that report that the report was  
17 either accurate or inaccurate, and then I would  
18 forward the information.

19 Q. A number of questions about that. When  
20 you say "firearm," you're referring to the  
21 Massachusetts definition which is a handgun; is that  
22 correct?

23 A. I'm not. There would be long arms and  
24 firearms. Long arms and pistols would be